

U S ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Superior Cleaning Solutions Site - Removal Polrep
 Final Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region V**

Subject: POLREP #2
 Final POLREP
 Superior Cleaning Solutions Site
 C557
 Dayton, OH
 Latitude: 39.7806280 Longitude: -84.1866660

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From: Steven Renninger, On-Scene Coordinator

Date: 2/28/2012

Reporting Period: January 7 through February 28, 2012

1. Introduction

1.1 Background

Site Number:	C557	Contract Number:	EP-S5-08-02
D.O. Number:	0098	Action Memo Date:	9/16/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/3/2012	Start Date:	1/3/2012
Demob Date:	2/28/2012	Completion Date:	2/28/2012
CERCLIS ID:	OHN 000510610	RCRIS ID:	
ERNS No.:		State Notification:	Ohio EPA
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Chemical Management Company (aka Superior Cleaning Solutions) operated at the Superior Cleaning Solutions (SCS) Site at 1224 North Keowee Street, Dayton, OH most recently and sold industrial cleaning supplies. CMC specialized in chemical needs for restaurants, nursing homes, and the hospitality industry until approximately 2008.

On June 20, 2011, the Ohio Environmental Protection Agency (Ohio EPA) received an email from the McCook Field Neighborhood Association complaining about unsecured, abandoned drums located within overgrown trees and brush on the southside of the site.

On June 22, 2011, Ohio EPA investigated the site and observed numerous unsecured drums outside of the facility. Ohio EPA secured the fencing at the site to prevent access to the numerous drums until the formation of a follow-up strategy.

On June 28, 2011, Ohio EPA and the Dayton Fire Department (DFD) conducted an investigation at the Site and observed numerous abandoned drums and containers having corrosive and flammable labels. Flammable and corrosive chemicals were found in excess of the Dayton Fire Code Exempt storage amounts.

1.1.2.1 Location

The SCS Site is a commercial property located at 1224 North Keowee Street in Dayton, Ohio. The geographical coordinates for the site are latitude 39° 46' 50.2" North and longitude 84° 11' 12.9" West. The site is abandoned and was historically used as a commercial chemical distribution and processing building. The previous occupant of the site was a chemical company called CMC (aka Superior Cleaning Solutions). The site is bordered to the north by a used car dealer, Deals for Wheels, to the east by residential properties, to the south by a commercial property, Boeckman Meats, and to the west by North Keowee Street.

Commercial businesses are located within 20 feet of the Site and the closest residences are located 50 feet east of the site.

1.1.2.2 Description of Threat

Drums and containers containing various corrosive and flammable liquids such as sodium hydroxide, fluorosilicic acid and xylene chemicals as well as numerous other unknown chemical drums are located inside the building. In addition, there is a wood gate at the rear of the property that encloses numerous unsecured 55-gallon and 35-gallon drums along the south side of the site building. The area where the drums are located is heavily overgrown with trees and brush.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On August 3, 2011, U.S. EPA OSC Steve Renninger and U.S. EPA's START contractor mobilized to the SCS Site to conduct a removal Site Assessment.

Activities performed during the Site Assessment included:

- Documenting Site conditions,
- Air monitoring,
- Collecting samples from drums and containers; and
- Submitting the samples for commercial laboratory analysis.

During the site assessment, approximately 160 55-gallon drums, 10 totes and 200 small containers (35-gallons or less) were documented abandoned on Site. Many of the drums and containers contained labels such as "Flammable Liquid", "Corrosive", "Hydrochloric Acid", "Sodium Hydroxide", "Fluorosilicic Acid", "Xylene", and "Caustic Soda". Numerous drums were in poor condition, bulging and leaking.

U.S. EPA collected 16 liquid samples during its Site Assessment. The samples were submitted for commercial laboratory analysis. Analytical results from liquid samples SCS-003, SCS-004, SCS-005, SCS-015, SCS-024 and SCS-025 documented liquid having flash points less than 140°F, which, according to 40 C.F.R. 261.21, verifies the characteristic of a hazardous waste for ignitability (D001).

Analytical results from liquid samples SCS-002, SCS-006, SCS-012, SCS-020 and SCS-022 documented pH levels less than 2.0 standard units, and analytical results from liquid samples SCS-010, SCS-013 and SCS-021 documented pH levels greater than 12.5 standard units. All eight liquid sample results, according to 40 C.F.R. 261.22, verify the characteristic of a hazardous waste for corrosivity (D002).

Abandoned drums, totes and containers are present at the abandoned Site. Based on the proximity of commercial

and residential properties, the drums and containers pose a potential direct contact threat to the public and a potential threat of release to the environment

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In a letter dated July 8, 2011, the DFD formally requested assistance from U S EPA to determine if the Site meets the criteria for a time-critical removal action. According to the DFD, "an inspection was conducted at the Site on June 28, 2011, and the Site appears to contain many abandoned materials that need to be evaluated prior to disposal. From inspection on the labels on the chemicals, it appears that flammable and corrosive materials are being stored in excess of the Dayton Fire Code allowable quantities for inside storage. Throughout the facility there are drums of process fluids that need proper characterization and disposal from the facility. Outside the facility are abandoned drums that will require proper characterization and disposal from the facility."

In a letter dated August 10, 2011, Ohio EPA formally requested assistance from U S EPA to determine if the Site meets the criteria for a time-critical removal action. Ohio EPA noted numerous abandoned drums and containers having flammable and corrosive labels were located inside and outside of the facility.

On November 16, 2011, U S EPA finalized the Emergency Contingency Plan. A copy of the finalized Emergency Contingency Plan can be found in the Documents Section of the site website www.epaosc.org/superiorcleaningsite

On September 16, 2011, the Director of U S EPA's Superfund Division approved an Action Memorandum approving funding for a time-critical removal action at the SCS Site.

On January 3, 2012, U S EPA, START and ERRS mobilized to the site to begin time-critical removal activities.

From January 3 through 6, 2012, ERRS staged all drums and containers for sampling, began clearing the building of nonhazardous debris and completed clearing the overgrown trees and debris on the property in order to access the drums and containers outside of the building.

2.1.2 Response Actions to Date

Week of January 9, 2012

No work was conducted on site.

Week of January 16, 2012

ERRS completed sampling all drums and containers. EPA START completed hazard categorizing all drum and container samples. The following four wastestreams were identified by U S EPA, EPA START and ERRS:

- Acid Liquid
- Caustic Liquid
- Flammable Liquid
- Neutral Liquid

ERRS continued to complete removal activities at the site. Empty drums were either crushed or cut apart using saws. All nonhazardous debris was staged in a rolloff box prior to off-site disposal. Small containers were hazard categorized in the field and bulked into larger containers having similar waste characteristics.

On January 19, 2012, one 20-cubic yard rolloff box was transported for off-site disposal to Stony Hollow Landfill, Dayton, Ohio.

Week of January 23, 2012

Waste disposal samples were generated and submitted to a laboratory for disposal analysis. ERRS began profiling the waste on site to

ERRS began bulking and consolidating wastestreams. ERRS continued removal activities in the site building. Empty drums were either crushed or cut apart using saws. All nonhazardous debris was staged in a rolloff box prior to off-site disposal. ERRS completed field categorizing and bulking the contents of small containers into 55-gallon drums.

Week of January 30, 2012

ERRS completed bulking the four wastestreams into the following containers, in preparation for final off-site disposal.

- Acid Liquid - The acid liquid wastestream was bulked into two 275-gallon plastic totes
- Caustic Liquid - The caustic liquid wastestream was bulked into two 275-gallon plastic totes and two 55-gallon drums
- Flammable Liquid - The flammable liquid wastestream was bulked into two 275-gallon totes and one 55-gallon drum
- Neutral Liquid - The neutral liquid wastestream was bulked into seven 275-gallon totes and three 55-gallon drums
- Waste Paint-Related Material - One-cubic yard box containing small containers of paint, aerosol cans and other containers that could not be bulked into a waste category
- Oxalic Acid - Two 5-gallon containers of oxalic acid

ERRS completed cleaning out the facility from nonhazardous debris. ERRS swept and power-washed the facility floor. All nonhazardous debris was placed into rolloff boxes prior to off-site disposal.

ERRS began arranging for off-site disposal. All crew demobilized on Friday 2/3/12 and will remobilize once disposal is scheduled.

On January 30, 2012, one 20-cubic yard rolloff box was transported for off-site disposal to Stony Hollow Landfill, Dayton, Ohio.

On February 3, 2012, one 20-cubic yard rolloff box was transported for off-site disposal to Stony Hollow Landfill, Dayton, Ohio.

Week of February 6, 2012

No work was conducted on site. Waste profiling/approval underway.

Week of February 13, 2012

No work was conducted on site. Waste profiling/approval underway.

Week of February 20, 2012

No work was conducted on site. Waste profiling/approval underway.

Week of February 27, 2012

On Tuesday, February 28, 2012, ERRS mobilized to the site and loaded the following waste onto a box truck for off-site disposal to EQ Detroit, Inc., located in Detroit, Michigan:

- Acid Liquid - Two 275-gallon plastic totes
- Caustic Liquid - Two 275-gallon plastic totes and two 55-gallon drums
- Flammable Liquid - Two 275-gallon totes and one 55-gallon drum
- Neutral Liquid - Seven 275-gallon totes and three 55-gallon drums
- Waste Paint-Related Material - One-cubic yard box
- Oxalic Acid - Two 5-gallon containers

The building is empty and all personnel and equipment were demobilized from the site. The U.S. EPA removal action is completed.

U.S. EPA met with representatives from the Ohio EPA and the Dayton Fire Department at the site to show that the removal action was completed and that all containerized waste was removed and transported for off-site disposal.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable of funding the removal action.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Non-hazardous debris	Solid	4 rolloff boxes (80-yd ³)		Landfill	Stony Hollow Landfill Dayton, OH

Acid Liquid	Liquid	550 gallons	008258154JJJ	Treatment	EQ Detroit Detroit, MI
Caustic Liquid	Liquid	660 gallons	008258154JJJ	Treatment	EQ Detroit Detroit, MI
Flammable Liquid	Liquid	605 gallons	008258154JJJ	Fuels Blending	EQ Detroit Detroit, MI
Neutral Liquid	Liquid	2,090 gallons	008258154JJJ	Treatment	EQ Detroit Detroit, MI
Waste Paint-Related Material	Liquid and Solids	1-yd3 box	008258154JJJ	Incineration	EQ Detroit Detroit, MI
Oxalic Acid	Solid	2 5-gallon containers	008258154JJJ	Treatment	EQ Detroit Detroit, MI

R5 Priorities Summary		
This is an Integrated River Assessment The numbers should overlap.	Miles of river systems cleaned and/or restored	N/A
	Cubic yards of contaminated sediments removed and/or capped	N/A
	Gallons of oil/water recovered	N/A
	Acres of soil/sediment cleaned up in floodplains and riverbanks	N/A
Stand Alone Assessment	Acres Protected	0 5
	Number of contaminated residential yards cleaned up	N/A
	Human Health Exposures Avoided	1,500
	Number of workers on site	7

2.2 Planning Section

2.2.1 Anticipated Activities

None

The U S EPA-funded removal action was initiated on January 3 and completed on February 28, 2012 Removal activities included the following

- 1 Developed and implemented a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan,
- 2 Developed and implemented a Site Security Plan,
- 3 Inventoried, sampled, and performed hazard characterization on all substances contained in drums, containers and totes,
- 4 Consolidated and packaged all hazardous substances, pollutants and contaminants for transportation and off-site disposal, and
- 5 Transported and disposed of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U S EPA's Off-Site Rule (40 C F R § 300.440)

2.2.1.1 Planned Response Activities

None. The removal action is completed

2.2.1.2 Next Steps

None The removal action is completed

2.2.2 Issues

None.

2.3 Logistics Section

Not applicable The site key was returned to OEPA OEPA will return the site key to the property owner

2.4 Finance Section

2.4.1 Narrative

ERRS (as of 2-21-12)

START (as of week ending 2-24-12)

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$114,953 00	\$71,586 00	\$43,367 00	37 73%
TAT/START	\$30,000 00	\$17,077 00	\$12,923 00	43 08%
Intramural Costs				
USEPA - Direct	\$30,000 00	\$8,600 00	\$21,400 00	71 33%
Total Site Costs	\$174,953 00	\$97,263 00	\$77,690 00	44 41%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The Health & Safety Plan was approved and signed by all site personnel

2.5.2 Liaison Officer

Not applicable

2.5.3 Information Officer

Not applicable

3. Participating Entities

3.1 Unified Command

Not applicable

3.2 Cooperating Agencies

Ohio EPA
Dayton Fire Department

4. Personnel On Site

U S EPA OSC -- 1
WESTON START - 1
ERRS (EQM and Inland Waters of Ohio) - 5

5. Definition of Terms

Not applicable

6. Additional sources of information

6.1 Internet location of additional information/report

The "Documents" link on the site website contains information such as U S EPA's Action Memorandum and U S EPA's Site Assessment Report

6.2 Reporting Schedule

None This is the final POLREP

7. Situational Reference Materials

Not applicable





